

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

KELLY PINN, individually and on behalf of all)
others similarly situated,)

Plaintiff,)

v.)

TRANSAMERICA LIFE INSURANCE)
COMPANY, NATHAN JOHNSON, AND)
BANUELOS INSURANCE AGENCY LLC)
D/B/A LEADS GURU,)

Defendants.)

Case No. 4:24-cv-266-P

**DEFENDANT NATHAN JOHNSON’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF’S FIRST AMENDED CLASS ACTION COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Nathan Johnson (“**Johnson**”), hereby respectfully files this Unopposed Motion for Extension of Time to Respond to Plaintiff Kelly Pinn’s First Amended Class Action Complaint (the “**First Amended Complaint**”), which seeks an extension of Johnson’s deadline to respond to the First Amended Complaint by twenty-one (21) days to October 17, 2024. In support of this motion, Johnson states the following:

1. On or about August 29, 2024, Plaintiff filed her First Amended Complaint in this action, which added Johnson as a Defendant. The First Amended Complaint was served on Johnson on September 5, 2024.

2. Johnson’s response is therefore currently due on September 26, 2024.

3. Johnson and his counsel require additional time to investigate the allegations in the First Amended Complaint and to prepare the response. Additional time is also required on account of other deadlines and obligations in counsel’s other matters. Johnson therefore requests an

extension of twenty-one (21) days, up to and including October 17, 2024, to respond to the First Amended Complaint.

4. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge periods of time for good cause where, as here, the requested extension is made before the deadline. Johnson respectfully submits that the above-stated reasons constitute good cause for the requested extension of time of twenty-one (21) days to file a response to the First Amended Complaint.

5. On September 20, 2024, Johnson's Ohio counsel, Jeffrey Saks, conferred with counsel for Plaintiff by e-mail regarding the requested extension, as Johnson was still in the process of attempting to retain Texas counsel. Anthony Paronich, one of the attorneys for Plaintiff, advised that Plaintiff does not object to the requested extension of time.

6. The requested extension is not sought for dilatory reasons or for any other improper purpose, will not prejudice any party or the Court, and no prior extension has been sought by Johnson.

WHEREFORE, Defendant Nathan Johnson respectfully requests this Court enter an order enlarging his time to respond to Plaintiff Kelly Pinn's First Amended Class Action Complaint up to and including October 17, 2024, and for any other relief this Court deems just and proper.

Dated: September 24, 2024

Respectfully submitted,

/s/ David E. Keltner

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**ATTORNEYS FOR DEFENDANT
NATHAN JOHNSON**

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1, the undersigned certifies that Jeffrey Saks, counsel for Nathan Johnson in Ohio, conferred with Anthony Paronich, counsel for Plaintiff, on September 20, 2024. Counsel for Plaintiff advised that Plaintiff does not object to the requested extension of time.

/s/ Ryan M. Roper
Ryan M. Roper

CERTIFICATE OF SERVICE

I certify that on September 24, 2024, I served the foregoing document electronically in accordance with the Federal Rules of Civil Procedure.

/s/ Ryan M. Roper
Ryan M. Roper